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Subject: Fw: Option for discussion on Thursday

Ginny, Pat, Richard:

See below for earlier e-mail communication with Dave Moore and Jim Ross on this issue.

Thanks,

Brian Nickel, E.I.T.

Environmental Engineer

US EPA Region 10 | Office of Water and Watersheds | NPDES Permits Unit

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<http://epa.gov/r10earth/waterpermits.htm>

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Brian Nickel/R10/USEPA/US

11/17/2009 10:52 AM

To	DMOO461@ECY.WA.GOV, JROS461@ECY.WA.GOV
cc	Laurie Mann/R10/USEPA/US@EPA, Ben Cope/R10/USEPA/US@EPA
Subject	Option for discussion on Thursday

Dave, Jim:

Here is an option that we can talk about during our modeling call on Thursday.

There's been a lot of confusion about why some point sources in the draft Spokane River TMDL have phosphorus wasteload allocations (WLAs) or loading assumptions of 36 ug/L while the City of Spokane and Spokane County get 42 ug/L. When the TMDL was being drafted, we expected that the NPDES permits would have monthly average effluent phosphorus limits of about 50 ug/L. The WLAs are slightly larger for Spokane City and County because we expected that these larger dischargers would be required to sample for phosphorus daily, and we expected that the smaller dischargers would only be expected to sample for phosphorus 2-3 times per week. Other factors being equal, a facility that samples more frequently can operate a little closer to its average monthly effluent limit, because there's less uncertainty when you have more samples. The WLAs are intended to reflect what the facilities will actually discharge (somewhat less than their effluent limits), so Spokane and Spokane County have slightly higher WLAs than the others due to the difference in assumed sampling frequency.

However, if permit limits for phosphorus are stated as seasonal (as opposed to monthly) averages, the assumptions underlying the WLAs would no longer be valid. Since both permitting authorities have expressed interest in seasonal average limits, the allocations could be adjusted such that all the point sources (except Kaiser and stormwater, which have always been treated differently) get the same allocation, on a concentration basis, but the total point source load of phosphorus stays the same as in the draft TMDL.

That way, instead of 42 ug/L for Spokane City and County and 36 ug/L for others, all the point sources (except Kaiser and stormwater) would get 40 ug/L phosphorus. That's a flow-weighted average; it's closer to 42 than 36 because Spokane City and County are the two largest point sources.

If Ecology decides to do this, we'd need to incorporate this small change in the "final" model run. Please call if you have any questions or concerns.

Thanks,

Brian Nickel, E.I.T.

Environmental Engineer

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